

Message

From: Fairbanks, Brianna [Fairbanks.Brianna@epa.gov]
Sent: 10/30/2018 10:05:57 PM
To: Calvino, Maria Soledad [Calvino.Maria@epa.gov]; Glenn, William [Glenn.William@epa.gov]; Chesnutt, John [Chesnutt.John@epa.gov]; LEE, LILY [LEE.LILY@EPA.GOV]
CC: Harris-Bishop, Rusty [Harris-Bishop.Rusty@epa.gov]
Subject: RE: NBC Bay Area News - EPA Cleanup Standards at Hunters Point

No concerns.

Brianna Fairbanks

Attorney/Advisor
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3907

From: Calvino, Maria Soledad
Sent: Tuesday, October 30, 2018 3:04 PM
To: Glenn, William <Glenn.William@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; LEE, LILY <LEE.LILY@EPA.GOV>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov>
Cc: Harris-Bishop, Rusty <Harris-Bishop.Rusty@epa.gov>
Subject: RE: NBC Bay Area News - EPA Cleanup Standards at Hunters Point

Due to her tight deadline, I suggest sending our one sentence response, which we already sent to the SF Chronicle:

"EPA has not reviewed the report published by the Committee to Bridge the Gap and will not be able to comment on it at this time."

Soledad Calvino
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From: Glenn, William
Sent: Tuesday, October 30, 2018 1:32 PM
To: Calvino, Maria Soledad <Calvino.Maria@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; LEE, LILY <LEE.LILY@EPA.GOV>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov>
Subject: FW: NBC Bay Area News - EPA Cleanup Standards at Hunters Point

There's more – see request from Liz Wagner below.

Bill Glenn
Acting Deputy Director
Office of Public Affairs
U.S. EPA, Pacific Southwest
glenn.william@epa.gov / (415) 947-4254

From: Wagner, Elizabeth (NBCUniversal) [<mailto:Elizabeth.Wagner@nbcuni.com>]
Sent: Tuesday, October 30, 2018 1:19 PM
To: Zito, Kelly <ZITO.KELLY@EPA.GOV>; Glenn, William <Glenn.William@epa.gov>
Cc: Witte, Rachel (NBCUniversal, KNTV) <rachelwitte@nbcuni.com>
Subject: FW: NBC Bay Area News - EPA Cleanup Standards at Hunters Point

Hello Kelly and Bill,

I'm reaching out to make sure the EPA has received our request for comment below. Our deadline is at 4p today. I'm not sure if Michele Huitric is still in the media office with the EPA.

Thanks,

Liz Wagner

LIZ WAGNER
INVESTIGATIVE REPORTER
NBC BAY AREA NEWS
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From: Wagner, Elizabeth (NBCUniversal)
Sent: Tuesday, October 30, 2018 11:43 AM
To: 'Huitric, Michele'
Cc: Witte, Rachel (NBCUniversal, KNTV)
Subject: NBC Bay Area News - EPA Cleanup Standards at Hunters Point

Hi Michele,

Can you please respond asap today? Our deadline is 4 p.m.

We understand the EPA has been recommending that the Navy use current versions of the EPA's Preliminary Remediation Goals Calculator for soil and buildings at the Hunters Point Shipyard – and that the Navy has refused to do so. (Please see excerpts of EPA documents below). We understand that instead, the Navy has continues to use outdated cleanup standards that some are alleging are not protective of human health.

- Can you confirm that the Navy is using outdated cleanup standards?
- Can you confirm the EPA has recommended that the Navy use current standards?
- Why is the EPA recommending that the Navy use current standards?
- What is the EPA's reaction to the Navy's use of outdated standards?
- What action can the EPA take to force the Navy to use the most current standards?
- Is the public's health at risk by the use of cleanup standards that are weaker than what the EPA requires?

Again, we're on a deadline of 4 p.m. and would appreciate a response asap.

LIZ WAGNER
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EPA letter to Navy, March 26, 2018, commenting on the Navy's February 2019 Draft Work Plan, Radiological Survey and Sampling

"11. Section 4.1.1 (Release Criteria) As part of the fourth Five-Year Review occurring in parallel this year, the Navy is performing updated risk evaluations of these existing Remedial Goals (RG's). **EPA has previously recommended that this evaluation should use the current versions of the USEPA's Preliminary Remediation Goals (PRG) Calculator for soil and the Building PRG Calculator for buildings (BPRG). The new work performed under this Work Plan should use cleanup criteria that reflect findings of the updated risk evaluations to ensure the protectiveness of the cleanup.**"

"31. Please find and update all references to the Nuclear Regulatory Commission's (NRC) Regulatory Guide 1.86, which has been withdrawn. Some of the release criteria in the RODs were originally based on Regulatory Guide 1.86 limits. Please see above comment on Section 4.1.1 (Release Criteria) **regarding review of the protectiveness of these criteria using the current versions of EPA's risk models, the PRG and BPRG Calculators.**"

EPA letter to Navy, August 14, 2018, commenting on the Navy's draft retesting plan for Parcel G

"9. Section 3.3 and 4.3, Remediation Goals for soil and buildings, respectively: These sections list the current ROD RGs. The HPNS's Five-Year Review occurring in 2018 is evaluating whether the current selected remedies, including these ROD RGs, are still protective and whether any changes are necessary to ensure continued protectiveness. **Based on national practices directed by EPA headquarters, EPA expects this process to use the most current version of the EPA Preliminary Remediation Goal (PRG) Calculator and Building PRG Calculator to assess the ROD radiological RGs. The Work Plan should use only those cleanup goals confirmed through this analysis to be protective.**"

From EPA comments in September 21, 2018 comments on the Navy's draft Five-Year Review

"2. Section 6.2.2, Changes in Toxicity and Other Contaminant Characteristics: EPA Guidance calls for evaluation of the significance of changes in toxicity values and other contaminant characteristics when conducting a Five-Year Review.¹ The EPA's Preliminary Remediation Goal (PRG) Calculators for soil, the Building PRG Calculator for buildings, and the Surface PRG Calculator for surfaces, "which are used to develop risk-based PRGs for radionuclides, are recommended by EPA for Superfund remedial radiation risk assessments." **EPA has previously commented that this fourth FYR should include updated risk evaluations for existing remediation goals (RGs) using the current versions of the EPA's PRG Calculators, but this is not addressed in the FYR. For example, risk should be calculated for soil, buildings, piers, and bollards. Please revise the FYR to include the results of updated risk evaluations for existing RGs using the current versions of the EPA's PRG calculators to ensure that existing RGs remain protective.**"

